



Maryland Department of Environment
Water Management Administration
Compliance Program - Western Division
33 W Franklin St, Ste 302, Hagerstown, MD 21742
301-665-2850

Field Inspection Report by: Oladapo John

Media Type(s): NPDES Industrial Minor Surface Water

Inspection Date: December 7, 2011

Site Name: National Archives & Records Administration

Facility Address: 8601 Adelphi Rd, College Park, MD 20740

County: Prince George's County

NPDES Industrial Minor Surface Water

Permit / Approval Numbers: 04-DP-2904

Site Status: Inactive

Site Condition: Noncompliance

Contact(s):

Lawrence M. Holley Sr. – NARA Representative

Walter D. Hayes – LB&B Program Manager

Jonathan Mack – LB&B Safety/QA Manager

Ivan W. Austin – LB&B Chief Engineer

Recommended Action: Additional Investigation Required, Continue Routine Investigation, Refer to Others (See Findings)

Inspection Reason: Routine Scheduled, Initial Quarterly, Initial Yearly

Evidence Collected:

Visual Observation

Inspection Findings:

This date I made an un-scheduled inspection at the above facility on Adelphi Road, to determine the compliance status of the active NPDES industrial minor surface water permit. I met Mr. Holley of NARA at the security post; I explained the reason why I was at the facility he advised LB&B maintain and operate the cooling tower, so they should have the records; Mr. Holley escorted me to LB&B office where I met the representatives. I then requested for the quarterly DMR from January 2010 through December 2011.

Mr. Walter Hayes advised the cooling tower although functional; do not discharge into state waters instead the water used in the cooling tower goes through series of operations were it finally evaporates. He also explained, because of this process, there is usually no discharge. He also showed me a memo from LB&B dated January 2010 to MDE explaining the cooling tower operational trend.

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I explained the importance and the necessity of submitting the quarterly DMR to MDE under the **active permit**.

Violations and Recommendation.

Under active permit, MDE require the permit tee to retain a minimum of 3 years worth of monitoring records including raw data and original strip chart recordings; calibration and maintenance records; and reports? [COMAR 26.08.04.03.03B(1)]. Update all DMR's and submit to MDE.

Contact Michael Richardson (Chief Industrial Permit Division) to officially request the termination of this permit.

This report will be forwarded to the District manager for the Compliance program.

NPDES Industrial Minor Surface Water - Inspection Checklist

| <i>Inspection Item</i> | <i>Status</i> | <i>Comments</i> |
|--|---------------------------|---|
| 1. Does the facility have a discharge permit? [Environment Article §9-323a(1-3)] | No Violations Observed | |
| 2. Is the discharge permit current? Has facility applied for renewal? [Environment Article §9-328a(1)] | No Violations Observed | |
| 3. Is the facility as described in the current permit? Are treatment processes as described in the current permit? [COMAR 26.08.04.01.01B(4)] | Not Evaluated | |
| 4. Has notification been submitted about any new, different or increased discharges? [40 CFR Part 122 Subpart C Section 122.42.b(1-3)] | No Violations Observed | |
| 5. Is the number and location of discharge points as described in the discharge permit? [Environment Article §9-3314] | Not Evaluated | |
| 6. Has permittee submitted correct name and address of receiving waters? [40 CFR 122.21.j(3)] | No Violations Observed | |
| 7. Is the permittee meeting the compliance schedule per permit requirements? [COMAR 26.08.04.02-1.02-1A(3)] | Out of Compliance | Permittee does not meet the compliance schedule per the permit requirements |
| 8. Has the operator or superintendent been certified by the Board in the appropriate classification for the facility? [COMAR 26.06.01.05A(1)] | Not Evaluated | |
| 9. Are adequate records being maintained for the sampling date, time, and exact location; analysis dates and times; individual performing analysis; and analytical results? [COMAR 26.08.04.03.03B(3)(a, b, c, e)] | Out of Compliance | Records are not maintained |
| 10. Are adequate records being maintained for the analytical methods/techniques used? [COMAR 26.08.04.03.03B(3)(d)] | Out of Compliance | Records are not maintained |

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|---|----------------------|--|
| 11. Does the permittee retained a minimum of 3 years worth of monitoring records including raw data and original strip chart recordings; calibration and maintenance records; and reports? [COMAR 26.08.04.03.03B(1)] | Out of Compliance | Permittee does not retain a minimum of 3 years |
| 12. Is the lab and monitoring equipment being properly calibrated and maintained? Are they keeping records to reflect this? [Environment Article §9-3313] | Not Evaluated | |
| 13. Is laboratory controls and appropriate quality assurance procedures properly operated and maintained? [40 CFR Part 122 Subpart C Section 122.41.e] | Not Evaluated | |
| 14. Has the permittee submitted the monitoring results on the proper Discharge Monitoring Report form? [COMAR 26.08.04.03.03C(1)] | Out of Compliance | No DMR since December 2010 |
| 15. Has the permittee submitted these results within the allotted time? [COMAR 26.08.04.03.03C(2)] | Out of Compliance | No DMR since December 2010 |
| 16. Are discharge monitoring reports complete and reflect permit conditions? [COMAR 26.08.04.03B(3)] | Out of Compliance | No DMR since December 2010 |
| 17. Is the facility being properly operated and maintained including:(a) stand-by power or equivalent provisions available, (b) adequate alarm system for power or equipment failure available, (c) all treatments units are in service, . [40 CFR Part 122 Subpart C Section 122.41.e] | Not Evaluated | |
| 18. Is sewage sludge managed correctly per permit requirements? [COMAR 26.04.06.03.03] | Not Applicable | |
| 19. Any by-pass since last inspection? Has permittee submitted notice of any by-pass? [40 CFR Part 122 Subpart C Section 122.41.m(4)(i)(C)] | Not Applicable | |
| 20. Any non-complying discharges experienced since last inspection? Has regulatory agency been notified? [40 CFR Part 122 Subpart C Section 122.41.l(6)] | Not Evaluated | |
| 21. Have overflows occurred since the last inspection? [COMAR 26.08.10.02A] | Not Evaluated | |
| 22. Has records of overflows been maintained at the facility for at least five years? [COMAR 26.08.10.06A-B] | Not Evaluated | |
| 23. Are flow measuring devices properly installed and operated, calibration frequency of flow meter adequate, flow measurement equipment adequate to handle expected ranges of flow? [40 CFR Part 122 Subpart C Section 122.41.e] | Not Evaluated | |

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| 24. Are discharge monitoring points adequate for representative sampling? Do parameters and sampling frequency meet the minimum requirements? Does the permittee use the method of sample collection required by the permit? [Environment Article §9-331(4)] | Not Evaluated | |
| 25. Are analytical testing procedures approved by EPA? If alternate analytical procedures are used, proper approval has been obtained? [COMAR 26.08.01.02B(1)] | Not Evaluated | |
| 26. Has the permittee notified the Department of the name and address of the commercial laboratory? [COMAR 26.08.04.03.03A(3)] | Not Evaluated | |
| 27. Were discharges observed at the authorized outfalls? Does the facility have any unauthorized discharges to waters of the State? [Environment Article §9-322] | Not Evaluated | |
| 28. Does the discharges or receiving waters have any visible pollutants (oil sheen, grease, turbidity, foam, floating solids, color), odor, noncompliant DO concentrations, and/or noncompliant temperature ranges? [Environment Article §9-314b(1)] | Not Evaluated | |
| 29. Were discharge samples collected? [Environment Article §9-261c(1)] | Out of Compliance | Please specify the details of the non-compliance. |
| 30. Is the facility required to have a storm water pollution prevention plan? Has storm water pollution prevention plan been developed and implemented as required? Does storm water pollution prevention plan require modifications to prevent runoff of pollutants? [40 CFR Part 122 Subpart B Section 122.26.c(1)(I)(A-B)] | No Violations Observed | |
| 31. Are the permit conditions being met? [Environment Article §9-326a(1)] | Out of Compliance | Permit conditions are not met. |



Inspector: _____
 Oladapo John

Received by: _____